

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K., and
T.D.,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH"; LDS
SOCIAL SERVICES a/d/a LDS, a Utah
corporation,

Defendants.

NO. 04-2338 RSM

DECLARATION OF CHARLES C.
GORDON RE: MOTION FOR
LEAVE TO TAKE DEPOSITIONS
AND CR 37(a)(2)
REPRESENTATION

Charles C. Gordon, being duly sworn on oath, deposes and says:

1. He is one of the lead counsel for the defendants in this matter.
2. He has met and conferred with plaintiff's counsel regarding defendant's request for additional discovery both by correspondence and by telephone conference on June 29, 2006.
3. Counsel were unable to resolve the issues presented in defendant's motion.
4. This declaration is submitted pursuant to CR 37(a)(2).

I declare under the laws of the State of Washington and of the United States that the foregoing is true and correct.

DECLARATION OF CHARLES C. GORDON RE: MOTION
FOR LEAVE TO TAKE DEPOSITIONS AND CR 37(a)(2)
REPRESENTATION - 1
No. 04-2338 RSM

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1 DATED this 29th day of June, 2006.
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Charles C. Gordon

CERTIFICATE OF SERVICE

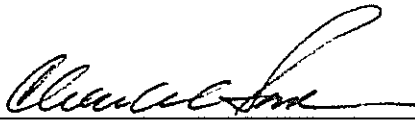
I hereby certify that on June 29, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following. The parties will additionally be served in the manner indicated.

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By 
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